

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 TERRY KENNETH SUGGS, JR., )  
 )  
 Defendant. )

Criminal Case No.: 19-134

**MOTION FOR AN EXTENSION  
OF TIME FOR THE FILING OF  
BRIEF IN SUPPORT OF  
MOTION TO SUPPRESS**

Filed on behalf of Defendant:  
Terry Kenneth Suggs, Jr.

Samir Sarna, Esquire  
Pa. Id. #310372

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	)	
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	)	
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	)	
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AND NOW, comes Defendant, Terry Kenneth Suggs, Jr., (“Mr. Suggs”) by and through his attorneys Samir Sarna, Esquire, and George Bills, Esquire, Sally Frick, Esquire, and William Theisen, Esquire, who moves this Court for an Order extending the time for the filing of brief in support of motion to suppress and avers the following:

1. Briefs in support and opposition of Mr. Suggs’s motion to suppress were ordered to be filed by the Defendant and Government on or before June 1<sup>st</sup>, 2021 for the above-captioned case.
2. Mr. Suggs wishes to review said brief in support of motion to suppress before it is filed with this Honorable Court.
3. However, due to Mr. Suggs being incarcerated in Allegheny County Jail, it is highly unlikely that Mr. Suggs would be able to receive and have time to review the brief before June 1<sup>st</sup>, 2021 as mail sent to the jail will likely not reach Mr. Suggs in a timely manner.
4. As such, Mr. Suggs respectfully requests this Honorable Court extend the time to file the brief in support of the motion to suppress to June 15<sup>th</sup>, 2021.

5. Defense Counsel communicated with AUSA Rebecca Silinski, who stated both her consent to this request, and her request that the Government also be granted two additional weeks to file the brief in opposition to the motion to suppress.

6. This extension will not prejudice the United States in any way.

**WHEREFORE**, it is respectfully requested that this Court grant Defendant's request for an extension to file the brief in support of the motion to suppress in this case, and the Government's brief in opposition to the motion to suppress until June 15<sup>th</sup>, 2021.

Respectfully submitted,

/s/ Samir Sarna  
Samir Sarna, Esquire

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**CERTIFICATE OF SERVICE**

I, Samir Sarna, Esquire, hereby certify that the within Motion for An Extension of Time for The Filing of Brief in Support of Motion to Suppress was served via electronic filing on this 27th day of May, 2021:

The Honorable Judge Joy Flowers Conti  
U.S. Courthouse  
700 Grant Street  
Pittsburgh, PA 15219

Rebecca Silinski, A.U.S.A.  
U.S. Courthouse  
700 Grant Street  
Suite 4000  
Pittsburgh, PA 15219

Respectfully submitted,

/s/ Samir Sarna  
Samir Sarna, Esquire  
Attorney for Defendant